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OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF SOCIAL JUSTICE
CIVIL RIGHTS BUREAU

May 18, 2023

Via Electronic Filing

Hon. Gabriel W. Gorenstein, U.S.M.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

Re: In re: New York City Policing During Summer 2020 Demonstrations,
1:20-CV-8924 (CM) (GWG) — This Letter Relates to All Cases

Dear Judge Gorenstein,

I write on behalf of the non-stayed Plaintiffs in the consolidated case above. Pursuant to your May 17, 2023 Order (ECF No. 999), please find enclosed a revised chart, excluding certain documents Plaintiffs had agreed were not responsive.

As Defendants note (ECF No. 1000), the joint letter—first presented to Defendants on March 29, 2023 and which was the result of an extensive meet and confer process—includes the positions on each of the guidepost documents that Defendants had provided prior to the filing, of which Plaintiffs had given Defendants sufficient notice. Plaintiffs have asked Defendants to submit the cited documents *in camera* (as Plaintiffs do not have access to the attachments and thus cannot send the Court the full “families”), as well as the referenced document requests. Plaintiffs do not agree with Defendants’ suggestion that submitting non-responsive documents for *in camera* review is necessary or a worthwhile use of the Court’s time. Plaintiffs will address Defendants’ remaining arguments, including their inappropriate framing of their re-review as an evidentiary dispute, tomorrow at the Court conference. Once again, we thank the Court for its continued time and attention.

Sincerely,

/s/ Lois Saldana

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CC: All relevant parties by electronic filing.

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